

REIZENSTEIN & ASSOCIATES , P.A.

2828 CORAL WAY
SUITE 540
MIAMI, FL 33145
PHONE: 305-444-0755
FAX: 305-444-9277

PHILIP L. REIZENSTEIN, ESQ.
BHAKTI KADIWAR, ESQ.

June 7, 2022

United States District Court
Southern District of New York
The Honorable Judge J. Paul Oetken
40 Foley Square
New York, NY 10007
Via email OetkenNYSDChambers@nysd.uscourts.gov

RE: United States v. Recio, 22-cr-281 (JPO)

Dear Judge Oetken:

Manuel Recio is a defendant in this case. Pursuant to his release and bail, his travel is restricted to the Southern District of New York and the Southern District of Florida.

Manuel Recio wishes to travel to Ft. Meyers, Florida, which is in the middle district of Florida, and approximately 160 miles from Miami, on Friday June 10, 2022, through Monday June 13, 2022, to escort his fourteen year old son to a baseball tournament that his son is participating in.

I have conferred with Sheb Swett, the AUSA handling this matter and the government deferred to the pre-trial officer supervising Mr. Recio. Via email, I have conferred with Mr. John Steinhilber, who is the pre-trial services officer supervising Mr. Recio. Mr. Steinhilber stated that he has no objections as long as

Mr. Recio provided his office with documentation of the tournament, completed a travel request form, and submitted travel documentation to his office.

Contemporaneous with filing this letter, I have emailed Mr. Steinhilber and the government a link to the baseball tournament. Mr. Recio will complete the travel request document on June 7, 2022.

The defense requests permission from the court for Mr. Recio to travel to and from Ft. Meyers, Florida, for the reasons stated herein.

Respectfully submitted,

s/ Philip L. Reizenstein, Esq.


Philip L. Reizenstein, Esq.
Florida Bar #634026
Admitted Pro Hac Vice

C: US Attorneys Office AUSA Sheb Swett, Esq.